

IN UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

do served
5-19-25
Alec T. [Signature]

SHOLEM WEISNER,

Plaintiff,

v.

GOOGLE LLC, and SHMUEL NEMANOV

Defendant.

Civil Action No. 20-cv-02862-AKH
("Weisner I")
Civil Action No. 23-cv-08186-AKH
("Weisner II")

JURY TRIAL DEMANDED

GOOGLE'S NOTICE OF MOTION AND MOTION TO FILE UNDER SEAL

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendant Google LLC ("Google") Motion to File Documents Under Seal and all other pleadings and proceedings in this Action, Google, by and through their counsel, will move this Court at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, NY 10007, on a date and time to be determined by the Court, for an Order directing that unredacted versions of Exhibits A, B, AA, AB, AC, AG, AH, AI, AJ, BA, BB, BC, BG, BH, BI, and BJ attached to the Joint Stipulation Consenting to Filing of Amended Answers, Google's Second Amended Answer in *Weisner I*, Google's First Amended Answer in *Weisner II*, and the same Exhibits AA, AB, AC, AG, AH, AI, AJ, BA, BB, BC, BG, BH, BI, and BJ attached to Google's Second Amended Answer in *Weisner I* and Google's First Amended Answer in *Weisner II* be filed and maintained under seal. Redacted versions of certain exhibits are also being filed for the public record, to the extent they contain non-confidential information. The basis for this motion is set forth in the accompanying Memorandum of Law.

Dated: May 16, 2025

/s/ Kevin J. Gu
By: Karim Z. Oussayef (NY Bar #4681334)
koussayef@desmaraisllp.com
Jamie L. Kringstein (NY Bar #5318928)
jkringstein@desmaraisllp.com
Ashley DaBiere (NY Bar #6117766)
adabiere@desmaraisllp.com
DESMARAIS LLP
230 Park Avenue
New York, NY 10169
Tel: (212) 351-3400
Fax: (212) 351-3401

Michael R. Rhodes (NY Bar #5379961)
mrhodes@desmaraisllp.com
Kevin J. Gu (*pro hac vice*)
kgu@desmaraisllp.com
DESMARAIS LLP
101 California Street, Suite 3000
San Francisco, CA 94111
Tel: (415) 573-1900
Fax: (415) 573-1901

Counsel for Defendant Google, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was filed electronically on May 16, 2025. As of this date, all counsel of record have consented to electronic service and are being served with a copy of this document through the Court's CM/ECF system.

/s/ Kevin J. Gu

Kevin J. Gu